

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**United States of America,**

Plaintiff,

v.

**Albert Rossini,**

Defendant.

**No. 1:17-cr-522**

Judge John J. Tharp

**Motion to Reset Sentencing**

Defendant Albert Rossini respectfully requests the Court reset the sentencing hearing, which is currently scheduled for July 30, 2025, to September 2025. Counsel anticipates that this will be the final request for a delay in sentencing.

As the Court is aware, Rossini has requested and been granted several previous continuances of the sentencing hearing due to concerns about ensuring continuity of medical care for his heart condition. As noted in previous motions, Rossini is classified as Care Level 3, which is for inmates who “are outpatients who have complex, and usually chronic, medical or mental health conditions and who require frequent clinical contacts to maintain control or stability of their condition, or to prevent hospitalization or complications.” Federal Bureau of Prisons Clinical Practice Guidance, at 3 (May 2019). Rossini’s heart is entirely dependent on a pacemaker implanted in his chest.

Counsel conferred with Rossini this morning for an update on his medical status. Rossini reports that he is still experiencing multiple atrial fibrillation episodes daily. He had a blood draw earlier this week and expects to undergo an EKG by the end of this week to determine whether he needs to be hospitalized or whether the issue can be treated with medication until his pacemaker battery is

replaced. Due to the potential need for hospitalization, Rossini requests that the Court reset the sentencing to September. At that point, his treatment plan will be clear. Absent any unexpected developments with his medical condition, Rossini does not anticipate requesting any additional continuances of the sentencing hearing.

Consequently, Rossini requests that the Court continue the sentencing hearing in this case to a date convenient for the Court in September 2025.

Respectfully Submitted,

/s/ James G. Vanzant  
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Attorney for Albert Rossini

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